

SEALED

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

RAMON AGUILAR, III,
aka "Nelson" (34)

CHRISTOPHER ALEXANDER,
aka "Bear" (35)

WILLIAM LEE BENHAM (36)

ERIC SCOTT BENSON,
aka "ESB" (37)

JENNIFER NICHOLE BLAIR (38)

RONNIE MIKEL BROWN (39)

JONAS CARRERA (40)

HUGO IVAN CASTANEDA,
aka "Takua" (41)

JOHN ANTHONY CHAVEZ, JR.
aka "BJ" (42)

JUSTO SALVADOR CHAVEZ, JR.,
aka "Junior" (43)

MICAH TORRENCE DEES (44)

ABRAHAM DIMAS, JR. (45)

TINA WYNETTE EASLEY,
aka "TINA WYNETTE FIELDS,"
aka "Big Tina" (46)

CRISSY LYNN EVANS (47)

TAYLOR MAXLYNN FLETCHER (48)

JOE LEE FOARD, JR. (49)

MICHAEL WILLIAM GETSINGER (50)

ALEJANDRO GONZALEZ (51)

QUINCY JOHN GOODSON,
aka "Kidd" (52)

FILED UNDER SEAL

NO. 3:14-CR-367

Supersedes Indictment

(as to new defendants) filed on June 24, 2015

Also supersedes Indictment in

Case No. 3:15-CR-173-B, filed on May 6, 2015

Defendants are listed in alphabetical
order, not by culpability or hierarchy

MICHAEL THOR GUINN (53)

TOMMY DARE HANCOCK,
aka "Big Tom" (54)

DAVID LESLEY HOLT (55)

DAVID WAYNE HOLT (56)

BRENNAN NICOLE HOUSE (57)

DESIRAE ANN HOUSER (58)

BEAU JAMES JARNAGIN,
aka "Beau Jamey" (59)

JEFF JEREMY JOHNSTON,
aka "Slowpoke" (60)

KORY WADE KLOECKER,
aka "Crawl" (61)

JIMMY DAVID LANCE (62)

SAMANTHA LADELL LARGENT (63)

BLAKE ALLEN LONG-ROCKEY (64)

VICTOR JAVIER MARTINEZ,
aka "Victor Torres" (65)

RICARDO GARCIA MEDINA (66)

BENJAMIN MATTHEW MELTON (67)

CRAIG DON MUELLER (68)

BRIAN CASEY MULLINS (69)

STACY WAYNE MYERS (70)

JAMES MARSHALL NATION (71)

WENDY RENEE NEAL (72)

MACKENZIE NELSON (73)

RAYMOND ANTHONY NICHOLS,
aka "Ant" (74)

SHANNA LYNN PALMER (75)

CHRISTIAN PEREZ (76)

FRANCISCO MANUEL RADAMEZ-NAVA,
aka "Ghost" (77)

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JORGE RAMIREZ,
aka "Gucci,"
aka "Jorge Ramirez-Martinez,"
aka "Jorge Alejandro" (78)

BRUCE CHANCE RASH,
aka "Chaos" (79)

JOHN JAMES RUMFIELD (80)

JACKIE LEMONDS SEGURA (81)

BRANDON KYLE SMITH (82)

ALICIA GALE TAMBOURINE,
aka "Slimm" (83)

JAMIE LYNN TUCKER (84)

TROY ANTHONY WALLACE (85)

ROGER WAYNE WHITWORTH, JR.,
aka "Peanut" (86)

JOHN FITZGERALD YATES,
aka "Po Boy" (87)

FILED UNDER SEAL

THIRD SUPERSEDING INDICTMENT

The United States Grand Jury Charges:

Introduction

1. At all times relevant to the Third Superseding Indictment, the defendants were members of, associated with, or performed drug transactions with various white supremacists organizations or individuals, including the "Aryan Brotherhood of Texas," the "Aryan Circle," the "White Knights," and the "Peckerwoods," and engaged in a conspiracy to distribute methamphetamine and other illegal narcotics throughout the Northern District of Texas and elsewhere. Certain defendants used firearms to further their drug trafficking activities.

Criminal Organizations

2. The “Aryan Brotherhood of Texas” (ABT) was a white supremacist gang based in Texas. The ABT originated in Texas prisons in the 1980s. The ABT offered protection to Caucasian inmates if they joined the gang. Over time, the ABT expanded and maintained a presence outside of prisons. ABT members referred to the gang as the “family.” The ABT was also an organized crime group that put its “business” interests ahead of ideology in recent years. These business interests often take the form of criminal ventures, including drug-dealing.

3. The “Aryan Circle” was a white supremacist gang based primarily in Texas. The Aryan Circle prison gang formed when certain ABT members splintered off to form what they believed was a more ideologically pure group. Aryan Circle members believed in the complete separation of the races. The Aryan Circle was also an organized crime group, but, like the ABT, in recent years, its white supremacy ideology often took a backseat to traditional criminal ventures, such as drug-dealing.

4. The “White Knights” were a Texas-based white supremacist prison gang (also active in Arizona in recent years) that were founded in 1991 by a group of offenders in the Texas Department of Criminal Justice. The gang’s hierarchy is composed of five ranking elders who are known as “the Wheel.” White Knights are also an organized crime group, but, like the ABT and the Aryan Circle, in recent years, its white supremacy ideology often took a backseat to traditional criminal ventures, such as drug-dealing.

5. The term “Peckerwood” was often used to describe an individual who, although not as member, shared a white supremacist ideology or aligned his or herself,

with other white supremacist organizations, such as the ABT, Aryan Circle, or White Knights. Individuals often resisted or denied membership with those groups because confirmed or documented membership typically resulted in administrative segregation within the Texas Department of Criminal Justice or other prison systems. This was typically viewed by prisoners as a less desirable way in which to serve prison time. Nonetheless, these individuals sought to indicate where their alliances resided through their identification as a "Peckerwood." Members were often referred to collectively as "Peckerwoods" or the "Wood Pile." Female members were often referred to as "Featherwoods." Other white supremacist organizations, such as the ABT and Aryan Circle also often referred to their members as "Peckerwoods" or "Woods." Despite their alliances with other white supremacists, the white supremacy ideology of Peckerwoods often takes a backseat to traditional criminal ventures, such as drug-dealing.

6. Despite their differences, the ABT, Aryan Circle, White Knights, and Peckerwoods often collaborate with each other and with Mexican gangs and cartels for purposes of drug distribution or other illegal ventures.

7. La Familia was a Mexican drug cartel and an organized crime syndicate based in the Mexican state of Michoacán. La Familia formed in the 1980s with the stated purpose of bringing order to Michoacán. La Familia came to the foreground in the 1990s as the Gulf Cartel's paramilitary group, designed to seize control of the illegal drug trade in Michoacán state from rival drug cartels. While it initially trained with Los Zetas, in 2006, the group splintered off into an independent drug trafficking operation. La Familia was one of the strongest and fastest growing cartels in Mexico.

Defendants

At all times relevant to this Third Superseding Indictment:

8. Up to twenty of the above listed defendants, including Christopher Alexander, aka "Bear," William Lee Benham, Jennifer Nichole Blair, Ronnie Mikel Brown, Crissy Lynn Evans, Michael William Getsigner, Tommy Dare Hancock, aka "Big Tom," Beau James Jarnagin, aka "Beau Jamey," David Lesley Holt, David Wayne Holt, Kory Wade Kloecker, aka "Crawl," Jimmy David Lance, Brian Casey Mullins, Stacy Wayne Myers, James Marshall Nation, Craig Don Mueller, Raymond Anthony Nichols, aka "Ant," Bruce Chance Rash, aka "Chaos," Jackie Lemonds Segura, and John Fitzgerald Yates were members or close associates of the ABT.

9. Up to eight of the above listed defendants, including Eric Scott Benson, aka "ESB," Ronnie Mikel Brown,¹ Tina Wynette Easley, aka "Tina Wynette Fields" aka "Big Tina," Quincy John Goodson, aka "Kidd," Jeff Jeremy Johnston, aka "Slowpoke," Blake Allen Long-Rockey, Benjamin Matthew Melton, and Alicia Gale Tambourine, aka "Slimm" were members or close associates of the Aryan Circle.

10. Defendant William Lee Benham was a member of the White Knights.²

¹ Defendant Ronnie Mikel Brown is listed as an associate of both the ABT and the Aryan Circle because he supplied narcotics to confirmed members of both organizations. Further, upon information and belief, Brown is not eligible for full membership in the ABT or the Aryan Circle because of certain prior convictions related to sexual offenses against minors.

² Defendant William Lee Benham is listed as a member of the White Knights and an associate of the ABT. Benham is known to have associated with a high-ranking official of the ABT.

11. Defendant John James Rumfield was a Peckerwood, as that term is defined above.

12. Defendant Justo Salvador Chavez, Jr., aka "Junior" and defendant Ricardo Medina were members of the La Familia drug cartel.

13. Defendant Stacy Myers was engaged in a romantic relationship with defendant Jennifer Nichole Blair for a period of time relevant to this Third Superseding Indictment. Myers resided with defendant Tina Wynette Easley, aka "Tina Wynette Fields," aka "Big Tina" for a period of time relevant to the Third Superseding Indictment.

14. Defendant Ronnie Mikel Brown was engaged in a romantic relationship with defendant Mackenzie Nelson until Brown was arrested in July 2015.

15. Defendant Hugo Ivan Castaneda, aka "Takua" and defendant Christian Perez resided together for a period of time relevant to the Third Superseding Indictment.

16. Defendant Christian Perez had a familial relationship (cousins) with defendant Alejandro Gonzalez and the two resided together for a period of time relevant to the Third Superseding Indictment.

17. Defendant Micah Torrence Dees and defendant Brennan Nicole House were engaged in a romantic relationship for a period of time relevant to the Third Superseding Indictment.

18. Defendant Jeff Jeremy Johnston, aka "Slowpoke" and defendant Alicia Gale Tambourine, aka "Slimm" were engaged in a romantic relationship for a period of time relevant to the Third Superseding Indictment.

19. Defendant James Marshall Nation and defendant Samantha Ladell Largent were engaged in a romantic relationship for a period of time relevant to the Third Superseding Indictment.

20. Defendant Wendy Renee Neal and defendant Desirae Ann Houser resided together for a period of time relevant to the Third Superseding Indictment.

Count One

Conspiracy to Possess with Intent to Distribute a Controlled Substance
[Violation of 21 U.S.C. § 846 and 18 U.S.C § 2]

21. The allegations contained in paragraphs 1 through 20 are realleged and fully incorporated herein.

The Conspiracy

22. Between in or about January 2013, and in or about November 2015, in the Dallas Division of the Northern District of Texas and elsewhere, the defendants, **Ramon Aguilar, III, aka "Nelson," Christopher Alexander, aka "Bear," William Lee Benham, Eric Scott Benson, aka "ESB," Jennifer Nichole Blair, Ronnie Mikel Brown, Jonas Carrera, Hugo Ivan Castaneda, aka "Takua," John Anthony Chavez Jr., aka "BJ," Justo Salvador Chavez Jr., aka "Junior," Micah Torrence Dees, Abraham Dimas Jr., Tina Wynette Easley, aka "Tina Wynette Fields" aka "Big Tina," Crissy Lynn Evans, Taylor Maxlynn Fletcher, Joe Lee Foard, Jr., Michael William Getsinger, Alejandro Gonzalez, Quincy John Goodson, aka "Kidd," Michael Thor Guinn, Tommy Dare Hancock, aka "Big Tom," David Lesley Holt, David Wayne Holt, Brennan Nicole House, Desirae Ann Houser, Beau James Jarnagin, aka "Beau Jamey," Jeff Jeremy Johnston, aka "Slowpoke," Kory Wade Kloecker, aka "Crawl," Jimmy David Lance, Samantha Ladell Largent, Blake Allen Long-Rockey, Victor Javier Martinez, aka "Victor Torres," Ricardo Garcia Medina, Craig Don Mueller, Brian Casey Mullins, Stacy Wayne Myers, James Marshall Nation, Wendy Renee Neal, Mackenzie Nelson, Raymond Anthony Nichols, aka "Ant," Shanna Lynn Palmer, Christian Perez, Francisco Manuel**

Radamez-Nava, aka "Ghost," Bruce Chance Rash, aka "Chaos," John James Rumfield, Jackie Lemonds Segura, Brandon Kyle Smith, Alicia Gale Tambourine, aka "Slimm," Jamie Lynn Tucker, Troy Anthony Wallace, Roger Wayne Whitworth Jr., aka "Peanut," and John Fitzgerald Yates, aka "Po Boy" knowingly and intentionally combined, conspired, confederated and agreed together and with each other, and with other persons known and unknown to the Grand Jury, to possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A); all in violation of 21 U.S.C. § 846 and 18 U.S.C. § 2.

Manner and Means of the Conspiracy

During the conspiracy as alleged herein, it was part of the conspiracy that one or more of the defendants and conspirators would:

23. Arrange for the acquisition of methamphetamine from persons both known and unknown to the Grand Jury.

24. Arrange for the distribution and delivery of methamphetamine to persons both known and unknown to the Grand Jury.

25. Utilize stash houses and other locations to store quantities of methamphetamine.

26. Act as intermediaries and brokers to negotiate the acquisition, price, delivery, and payment for quantities of methamphetamine.

27. Sell or purchase methamphetamine from one another or for other persons known and unknown to the Grand Jury.

28. Utilize cellular telephones to discuss, negotiate, and facilitate drug transactions.

29. Each of the conspirators listed herein was linked to one another either directly or through another conspirator. Certain conspirators acted as hubs for narcotics trafficking, supplying methamphetamine to numerous other conspirators.

30. Certain conspirators did not know the identity of all of the other conspirators and did not know all of the details or all of the activities undertaken by other conspirators. There was no formal agreement entered into by the conspirators, instead, the conspirators entered into the conspiracy through their actions and drug transactions.

Overt Acts

31. In furtherance of the conspiracy, the defendants, and others known and unknown to the Grand Jury, committed the following overt acts in the Dallas Division of the Northern District of Texas and elsewhere:

a. In or about 2014 and 2015, Aguilar possessed and distributed approximately 48 kilograms of methamphetamine³ to another individual known to the Grand Jury, and, upon Aguilar's instruction, that methamphetamine was later sold to another individual.

b. In or about 2014 and 2015, Aguilar possessed and distributed approximately 27 kilograms of methamphetamine to John Anthony Chavez, Jr. John Anthony Chavez, Jr. then sold that methamphetamine to another individual.

³ For purposes of the listing of the overt acts, the phrase "a mixture or substance containing a detectable amount of methamphetamine" has been replaced and referred to simply as "methamphetamine." This was done for purposes of brevity and should not be read to suggest any purity level for any specific amount.

c. On or about August 19, 2014, Aguilar and another individual known to the Grand Jury, were in possession of distribution amounts of methamphetamine.

d. On or about February 20, 2015, Mullins possessed approximately 27.8 grams of methamphetamine and distributed that methamphetamine to Getsinger. Getsinger then distributed that same amount of methamphetamine to Alexander. Evans facilitated the transaction between Getsinger and Alexander through the use of cellular telephones and other means. Alexander then possessed and distributed the 27.8 grams of methamphetamine to another individual.

e. On or about February 15, 2013, approximately 12 kilograms of methamphetamine was seized from Benham's mother, who identified Benham and another individual as the individuals who instructed her to transport the methamphetamine.

f. On or about January 9, 2015, Benham sold approximately 7 grams of methamphetamine to an individual.

g. On or about July 15, 2015, Brown possessed approximately 58 grams of methamphetamine and distributed that methamphetamine to Benson, which Benson then sold to another individual.

h. On or about February 2, 2015, Blair and Myers sold approximately 20 grams of methamphetamine to an individual.

i. On or about July 20, 2015, Brown was in possession of approximately 34 grams of methamphetamine, which represented a distribution amount of a controlled substance. Brown was also in possession of firearms on this date.

j. On or about May 19, 2015, Brown possessed and distributed approximately 56 grams of methamphetamine to Long-Rockey and Mueller. Long-Rockey then sold the 56 grams of methamphetamine to another individual. Mueller facilitated the transaction.

k. On or about February 11, 2015, Carrera possessed and distributed approximately 54.58 grams of methamphetamine to an individual.

l. On or about May 7, 2014, Castaneda possessed and distributed approximately two ounces of methamphetamine to Medina, who then distributed that methamphetamine to another individual.

m. On or about January 15, 2015, Castaneda possessed and distributed approximately four ounces of methamphetamine to another individual.

n. On or about April 23, 2015, John Anthony Chavez, Jr. possessed and distributed approximately 2,680 grams of methamphetamine to Nation and Largent, which represented a distribution amount of methamphetamine.

o. On or about May 26, 2015, Justo Salvador Chavez, Jr. possessed and distributed approximately 113 grams of methamphetamine to an individual.

p. On June 5, 2015, Dees and Wallace obtained approximately 522 grams of methamphetamine from Lance. Wallace distributed the methamphetamine to Dees and House. The methamphetamine was seized from Dees and House. Dees and House possessed this methamphetamine with the intent to distribute it.

q. Between in or about November 2014 and in or about June 2015, Dees possessed and distributed approximately 2.5 kilograms of methamphetamine.

r. On or about May 5, 2015, Dimas possessed approximately 474 grams of methamphetamine, which represented a distribution amount of a controlled substance.

s. On or about July 8, 2015, Easley possessed and sold methamphetamine to another individual.

t. On or about July 13, 2015, Easley was in possession of approximately 479 grams of methamphetamine, which represented a distribution amount of a controlled substance. Easley was also in possession of a firearm on this date, which was found alongside the methamphetamine.

u. On or about August 14, 2014, Fletcher was in possession of and distributed approximately 11 grams of methamphetamine to another individual.

v. On or about April 4, 2015, Fletcher was in possession of approximately 7 grams of methamphetamine, which represented a distribution amount of a controlled substance.

w. On or about September 4, 2015, Foard was in possession of approximately 224 grams of methamphetamine, which represented a distribution amount of a controlled substance.

x. On or about August 14, 2015, Gonzalez and Perez were in possession of 124 grams of methamphetamine, which represented a distribution amount of a controlled substance. Gonzalez and Perez were also in possession of firearms on this date.

y. Between in or about August 2014 and on or about July 20, 2015, Goodson purchased 1 to 1 ½ ounces of methamphetamine from another individual every two weeks. Goodson then distributed the methamphetamine that he had purchased.

z. In or about April 2015, Guinn was in possession of approximately one pound of methamphetamine, which represented a distribution amount of a controlled substance. Guinn was also in possession of firearms during this same time period.

aa. Between in or about January 2015 and in or about April 2015, Hancock was in possession of pound quantities of methamphetamine, which represented distribution amounts of a controlled substance.

bb. On or about January 29, 2015, David Lesley Holt was in possession and distributed approximately 3.5 grams of methamphetamine to another individual.

cc. On or about August 6, 2014, David Wayne Holt was in possession and distributed approximately 14 grams of methamphetamine to another individual.

dd. On or about May 18, 2015, while riding a stolen ATV, David Wayne Holt was in possession of approximately 2.4 grams of methamphetamine, which represented a distribution amount of a controlled substance. David Wayne Holt also struck a law enforcement officer during the pursuit.

ee. Between in or about May 2015 and in or about June 2015, House knowingly possessed and transported methamphetamine at the direction of Dees for the purpose of distribution of controlled substances.

ff. In or about September 2015, Houser possessed and distributed gram quantities of methamphetamine to another individual on multiple occasions.

gg. On or about June 14, 2014, Jarnagin was in possession of approximately six grams of methamphetamine, which represented a distribution amount.

hh. On or about May 25, 2015, Tambourine, and Whitworth, Jr. possessed and distributed approximately 28 grams of methamphetamine. Johnston initially negotiated and facilitated a drug transaction involving the same 28 grams. Tambourine and Whitworth, Jr. transported the methamphetamine and completed the transaction on behalf of Johnston.

ii. On or about October 2, 2015, Benham possessed and distributed one ounce of methamphetamine to Neal and Kloecker, which represented a distribution amount of a controlled substance.

jj. On or about October 13, 2015, Kloecker and other individuals possessed and distributed approximately one ounce of methamphetamine

kk. On or about February 4, 2015, Lance possessed and distributed approximately 28 grams of methamphetamine.

ll. On or about September 10, 2015, Lance possessed approximately 2,243 grams of methamphetamine, which represented a distribution amount of a controlled substance.

mm. On or about October 28, 2014, Martinez possessed and distributed approximately two kilograms of methamphetamine to another individual known to the Grand Jury.

nn. On or about March 27, 2014, April 2, 2014, April 23, 2014, May 1, 2014, and May 21, 2014, Medina possessed and distributed ounce quantities of methamphetamine. Some of this methamphetamine was supplied by Castaneda.

oo. On or about March 17, 2015, Mullins possessed and distributed approximately 27 grams of methamphetamine.

pp. Between in or about March 2015 an April 2015, Nation was in possession of approximately 30 kilograms of methamphetamine, which represents a distribution amount of a controlled substance.

qq. In or about July 2015, Nelson was in possession of distribution amounts of methamphetamine.

rr. Between in or about April 2015 and July 2015, Nichols possessed ounce quantities of methamphetamine which he obtained from Lance, which represented distribution amounts.

ss. On or about August 5, 2015, Palmer was in possession and distributed approximately 3.5 grams of methamphetamine.

tt. On or about March 19, 2015, Radamez-Nava was in possession and distributed approximately 196 grams of methamphetamine.

uu. In or about January 2015 and February 2015, Ramirez was in possession and distributed kilogram quantities of methamphetamine.

vv. On or about April 21, 2015, Rash was in possession and distributed approximately 49 grams of methamphetamine.

ww. In or about June and July 2015, Rumfield possessed and distributed methamphetamine.

xx. On or about June 3, 2015, Segura possessed and distributed approximately 25 grams of methamphetamine.

yy. In or about July and/or August 2015, Smith possessed approximately $\frac{1}{4}$ pound of methamphetamine, which represented a distribution amount of a controlled substance.

zz. On or about July 15, 2015, Tucker was in possession of approximately 468 grams of methamphetamine, which represented a distribution amount of a controlled substance.

aaa. On or about June 2, 2015, Yates possessed and distributed approximately 28 grams of methamphetamine.

bbb. On or about August 25, 2015, Yates was in possession of approximately 476 grams of methamphetamine, which represented a distribution amount of a controlled substance.

Counts Two through Fifty-Three

Possession of a Controlled Substance with Intent to Distribute
 [Violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C) and 18 U.S.C. § 2]

32. The allegations contained in paragraphs 1 through 31 are realleged and fully incorporated herein.

33. On or about the dates listed below, in the Dallas Division of the Northern District of Texas and elsewhere, the defendants listed below, knowingly possessed with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841 (a)(1) and (b)(1)(C) and 18 U.S.C. § 2.

Count	Defendant	On/In or About
2	Ramon Aguilar, III, aka "Nelson"	August 19, 2014
3	Christopher Alexander, aka "Bear"	February 20, 2015
4	William Lee Benham	January 9, 2015
5	Eric Scott Benson, aka "ESB"	July 15, 2015
6	Jennifer Nichole Blair	February 2, 2015
7	Ronnie Mikel Brown	July 15, 2015
8	Jonas Carrera	February 11, 2015
9	Hugo Ivan Castaneda, aka "Takua"	January 15, 2015
10	Justo Salvador Chavez, Jr., aka "Junior"	May 26, 2015
11	John Anthony Chavez, Jr., aka "BJ"	April 23, 2015
12	Micah Torrence Dees	November 2014 - June 2015
13	Abraham Dimas, Jr.	May 5, 2015
14	Tina Wynette Easley, aka "Tina Wynette Fields," aka "Big Tina"	July 13, 2015
15	Crissy Lynn Evans	February 20, 2015
16	Taylor Maxlynn Fletcher	August 14, 2014
17	Joe Lee Foard, Jr.	September 4, 2015
18	Michael William Getsinger	February 20, 2015
19	Alejandro Gonzalez	August 14, 2015
20	Quincy John Goodson, aka "Kidd"	August 2014 - July 20, 2015
21	Michael Thor Guinn	April 2015
22	Tommy Dare Hancock, aka "Big Tom"	January 2015 - April 2015
23	David Lesley Holt	January 29, 2015
24	David Wayne Holt	May 18, 2015

25	Brennan Nicole House	May 2015 - June 2015
26	Desirae Ann Houser	September 2015
27	Beau James Jarnagin, aka "Beau Jamey"	June 14, 2015
28	Jeff Jeremy Johnston, aka "Slowpoke"	May 25, 2015
29	Kory Wade Kloecker, aka "Crawl"	October 13, 2015
30	Jimmy David Lance	February 4, 2015
31	Samantha Ladell Largent	April 23, 2015
32	Blake Allen Long-Rockey	May 19, 2015
33	Victor Martinez, aka "Victor Torres"	October 28, 2014
34	Ricard Garcia Medina	March 2014 - May 2014
35	Craig Don Mueller	May 19, 2015
36	Brian Casey Mullins	March 17, 2015
37	Stacy Wayne Myers	February 2, 2015
38	James Marshall Nation	March 2015 - April 2015
39	Wendy Renee Neal	October 2, 2015
40	Mackenzie Nelson	July 2015
41	Raymond Anthony Nichols, aka "Ant"	April 2015 - July 2015
42	Shanna Lynn Palmer	August 5, 2015
43	Christian Perez	August 14, 2015
44	Francisco Manuel Radamez-Nava aka "Ghost"	March 19, 2015
45	Bruce Chance Rash, aka "Chaos"	April 21, 2015
46	John James Rumfield	June and/or July 2015
47	Jackie Lemonds Segura	June 3, 2015
48	Brandon Kyle Smith	July and/or August 2015
49	Alicia Gale Tambourine, aka "Slimm"	May 25, 2015
50	Jamie Lynn Tucker	July 15, 2015
51	Troy Anthony Wallace	June 5, 2015
52	Roger Wayne Whitworth, Jr., aka "Peanut"	May 25, 2015
53	John Fitzgerald Yates, aka "Po Boy"	June 2, 2015

Counts Fifty-Four through Sixty
 Possession of a Firearm by a Felon
 [Violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2)]

34. The allegations contained in paragraphs 1 through 33 are realleged and fully incorporated herein.

35. On or about the dates listed below, in the Dallas Division of the Northern District of Texas, the defendants listed below, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, as described below, all in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

Count	Defendant	On or About	Firearm
54	Ronnie Mikel Brown	July 20, 2015	Springfield, XD-40, 40S&W pistol, SN: XD303431, Sig, Mosquito 22lr pistol, SN: F258252
55	Tina Wynette Easley, aka "Tina Wynette Fields," aka "Big Tina"	July 13, 2015	Excac Model TA .38 Special Deringer, Serial Number A42651,
56	Michael Thor Guinn	April 28, 2015	Ruger P-89 9mm pistol, SN: 313-50900
57	Tommy Dare Hancock, aka "Big Tom"	April 19, 2015	Sig P250
58	David Wayne Holt	June 6, 2013	Ruger .380 Pistol, Serial Number 371017672
59	Jeff Jeremy Johnston, aka "Slowpoke"	February 23, 2012, through November 17, 2012	Taurus PT92 or similar model, Colt 1911 45 caliber
60	Benjamin Matthew Melton	September 10, 2015	Smith & Wesson 9mm pistol, SN: FWR6384

Count Sixty-One

Illegal Alien in Possession of a Firearm
[Violation of 18 U.S.C. §§ 922(g)(5)(A) and 924(a)]

36. The allegations contained in paragraphs 1 through 35 are realleged and fully incorporated herein.

37. On or about March 11, 2015, in the Dallas Division of the Northern District of Texas, defendant **Jorge Alejandro Ramirez-Martinez**, then being an alien illegally and unlawfully in the United States, did knowingly possess in and affecting interstate and foreign commerce a firearm, to wit, a Glock, 9mm pistol, model 17, bearing serial number ANW785US.

All in violation of 18 U.S.C. §§ 922(g)(5)(A) and 924(a).

Forfeiture Notice

[21 U.S.C. § 853(a); 18 U.S.C. § 2461(c); 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c)]

38. The allegations contained in paragraphs 1 through 37 are realleged and fully incorporated herein.

39. Upon conviction for any of the offenses alleged in Counts One through Fifty-Three of this Third Superseding Indictment and pursuant to 21 U.S.C. § 853(a), the defendants, **Ramon Aguilar (III), aka "Nelson," Christopher Alexander, aka "Bear," William Lee Benham, Eric Scott Benson, aka "ESB," Jennifer Nichole Blair, Ronnie Mikel Brown, Jonas Carrera, Hugo Ivan Castaneda, aka "Takua," John Anthony Chavez Jr., aka "BJ," Justo Salvador Chavez, Jr. aka "Junior," Micah Torrence Dees, Abraham Dimas Jr., Tina Wynette Easley, aka "Tina Wynette Fields" aka "Big Tina," Crissy Lynn Evans, Taylor Maxlynn Fletcher, Joe Lee Foard, Jr., Michael William Getsinger, Alejandro Gonzalez, Quincy John Goodson, aka "Kidd," Michael Thor Guinn, Tommy Dare Hancock, aka "Big Tom," David Lesley Holt, David Wayne Holt, Brennan Nicole House, Desirae Ann Houser, Beau James Jarnagin, aka "Beau Jamey," Jeff Jeremy Johnston, aka "Slowpoke," Kory Wade Kloecker, aka "Crawl," Jimmy David Lance, Samantha Ladell Largent, Blake Allen Long-Rockey, Victor Javier Martinez, aka "Victor Torres," Ricardo Garcia Medina, Craig Don Mueller, Brian Casey Mullins, Stacy Wayne Myers, James Marshall Nation, Wendy Renee Neal, Mackenzie Nelson, Raymond Anthony Nichols, aka "Ant," Shanna Lynn Palmer, Christian Perez, Francisco Manuel Radamez-Nava, aka "Ghost," Bruce Chance Rash, aka "Chaos," John James Rumfield, Jackie Lemonds Segura, Brandon Kyle Smith, Alicia Gale Tambourine,**

aka "Slimm," Jamie Lynn Tucker, Troy Anthony Wallace, Roger Wayne Whitworth, Jr. aka "Peanut," and John Fitzgerald Yates, aka "Po Boy", shall forfeit to the United States of America all property, real or personal, constituting, or derived from, the proceeds obtained, directly or indirectly, as a result of the respective offense; and any property, real or personal, used or intended to be used, in any manner or part, to commit or facilitate the commission of the respective offense. This property specifically includes firearms seized from Perez and Gonzalez, including a Smith & Wesson M&P15, 223 rifle, SN: SM66349, a Maverick by Mossberg Model 88, 12 gauge shotgun SN MV26955V, and a CZ 75 9mm pistol, SN: 121742.

40. Upon conviction for the offenses alleged in Counts Fifty-Four through Sixty-One of this Third Superseding Indictment and pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. §2461(c), the defendants, **Ronnie Mikel Brown, Tina Wynette Easley, aka "Tina Wynette Fields" aka "Big Tina," Michael Thor Guinn, Tommy Dare Hancock, aka "Big Tom," David Wayne Holt, Jeff Jeremy Johnston, aka "Slowpoke," Benjamin Matthew Melton, Christian Perez, Alejandro Gonzalez, and Jorge Ramirez, aka "Gucci," aka "Jorge Ramirez-Martinez," aka "Jorge Alejandro,"** shall forfeit to the United States of America all firearms and ammunition involved in or used in the respective offense(s).


41. The above-referenced property (in paragraph 40) includes, but is not limited to the weapons listed in Counts Fifty-Four through Sixty-One above.

A TRUE BILL



FOREPERSON

JOHN R. PARKER
UNITED STATES ATTORNEY



P.J. MEITL
Assistant United States Attorney
District of Columbia Bar No. 502391
Virginia Bar No. 73215
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Telephone: 214.659.8680
Facsimile: 214.659.8812
Email: philip.meitl@usdoj.gov

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

RAMON AGUILAR, III, aka "Nelson" (34), CHRISTOPHER ALEXANDER, aka "Bear" (35), WILLIAM LEE BENHAM (36), ERIC SCOTT BENSON, aka "ESB" (37), JENNIFER NICHOLE BLAIR (38), RONNIE MIKEL BROWN (39), JONAS CARRERA (40), HUGO IVAN CASTANEDA, "Takua" (41), JOHN ANTHONY CHAVEZ, aka "BJ" (42), JUSTO SALVADOR CHAVEZ, JR., aka "Junior" (43), MICAH TORRENCE DEES (44), ABRAHAM DIMAS, JR. (45), TINA WYNETTE EASLEY, aka "TINA WYNETTE FIELDS," aka "Big Tina" (46), CRISSY LYNN EVANS (47), TAYLOR MAXLYNN FLETCHER (48), JOE LEE FOARD, JR. (49), MICHAEL WILLIAM GETSINGER (50), LEJANDRO GONZALEZ (51), QUINCY JOHN GOODSON, aka "Kidd" (52), MICHAEL THOR GUINN (53), TOMMY DARE HANCOCK, aka "Big Tom" (54), DAVID LESLEY HOLT (55), DAVID WAYNE HOLT (56), BRENNAN NICOLE HOUSE (57), DESIRAE ANN HOUSER (58), BEAU JAMES JARNIGAN, aka "Beau Jamey" (59), JEFF JEREMY JOHNSTON, aka "Slowpoke" (60), KORY WADE KLOECKER, aka "Crawl" (61), JIMMY DAVID LANCE (62), SAMANTHA LADELL LARGENT (63), BLAKE ALLEN LONG-ROCKEY (64), VICTOR MARTINEZ, aka "Victor Torres" (65), RICARDO GARCIA MEDINA (66), BENJAMIN MATTHEW MELTON (67), CRAIG DON MUELLER (68), BRIAN CASEY MULLINS (69), STACY WAYNE MYERS (70), JAMES MARSHALL NATION (71), WENDY RENE NEAL (72), MACKENZIE NELSON (73), RAYMOND ANTHONY NICHOLS, aka "Ant" (74), SHANNA LYNN PALMER (75), CHRISTIAN PEREZ (76), FRANCISCO MANUEL RADAMEZ-NAVA, aka "Ghost" (77), JORGE RAMIREZ, aka "Gucci," aka "Jorge Ramirez-Martinez," aka "Jorge Alejandro" (78), BRUCE CHANCE RASH, aka "Chaos" (79), JOHN JAMES RUMFIELD (80), JACKIE LEMONDS SEGURA (81) BRANDON KYLE SMITH (82), ALICIA GALE TAMBOURINE, aka "Slimm" (83), JAMIE LYNN TUCKER (84), TROY ANTHONY WALLACE (85), ROGER WAYNE WHITWORTH, JR., aka "Peanut" (86), JOHN FITZGERALD YATES, aka "Po Boy" (87)

SUPERSEDING INDICTMENT

21 U.S.C. § 846 and 18 U.S.C. § 2
Conspiracy to Possess with Intent to Distribute a Controlled Substance

21 U.S.C. § 841(a)(1) and (b)(1)(C) and 18 U.S.C. § 2
Conspiracy to Possess with Intent to Distribute a Controlled Substance

18 U.S.C. §§ 922(g)(5)(A) and 924(a)
Conspiracy to Possess with Intent to Distribute a Controlled Substance

18 U.S.C. §§ 922(g)(1) and 924(a)(2)
Possession of a Firearm by a Felon

21 U.S.C. § 853(a); 18 U.S.C. § 2461(c);
18 U.S.C. § 924 (d) and 28 U.S.C. § 2461(c)
Forfeiture

62 Counts


A true bill rendered


DALLAS FOREPERSON

Filed in open court this 4th day of November, 2015.

Clerk

**TOMMY HANCOCK and JORGE MARTINEZ ARE IN FEDERAL CUSTODY.
WARRANTS NEEDED FOR ALL OTHER DEFENDANTS**


UNITED STATES DISTRICT/MAGISTRATE JUDGE
Criminal matter pending – 3:15-CR-367 and 3:15-CR-173-B